

Exhibit G

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

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In Re Bard IVC Filters Products
Liability Litigation
No. MD-15-02641-PHX-DGC

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DO NOT DISCLOSE - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

VIDEOTAPED DEPOSITION OF DAVID HENRY, M.D.

TAKEN AT: Leib Knott Gaynor
LOCATED AT: 219 North Milwaukee Street
Milwaukee, WI

April 6, 2017
10:07 a.m. to 12:28 p.m.
REPORTED BY ANITA K. FOSS
REGISTERED PROFESSIONAL REPORTER

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1 in addition to the medication?

2 A. Well, we're not always certain how the
3 body will react to blood thinning medication. And
4 if the patient has a pattern of -- of getting
5 clots, there's concern that one more clot could --
6 could be devastating. You err on the side of
7 caution, and you want to make sure that somehow the
8 patient is protected. And henceforth the notion of
9 a filter would serve that purpose.

10 Q. Somewhat of a belt-and-suspenders
11 approach here with the medicine and the filter?

12 A. Yes.

13 Q. Getting to the type of filter and your
14 discussions with the patient. Did you have any
15 plan or follow-up that you implemented at the time
16 you saw Ms. Hyde for her to return so that she
17 could be evaluated for removal of the filter?

18 A. Yes. I said to her -- or I may have
19 said; I don't recall specifically speaking to
20 her -- but in the patients that I put temporary
21 filters in, I usually say to them, depending upon
22 how you do over the interim and many other factors,
23 that there's the potential that this filter could
24 be permanent or be temporary.

25 Q. It could be either?

1 A. Yes.

2 Q. Did you make any plan, or chart anywhere
3 in the record, a follow-up appointment for her to
4 have an assessment about whether or not it was
5 appropriate in the future to remove the filter?

6 A. I don't specifically recall --

7 Q. I don't see one, but I --

8 A. -- if it's in writing or -- I do not -- I
9 do not recall.

10 Q. Well, if it was an appointment that you
11 made, there would typically be a notation of that
12 appointment?

13 MR. LEIB: In his chart?

14 BY MR. SAELTZER:

15 Q. Yes. Yeah, you chart those type of
16 things?

17 MR. LEIB: If you know. If you recall.

18 THE WITNESS: I don't particularly
19 recall. But I see something here makes mention of
20 the fact that she was also seeing a hematologist
21 who would be fairly expert on her blood, the makeup
22 of her blood, hematology, her risk for clots, her
23 treatment options as well as anything I had to
24 offer or the internal medicine care doctor. And
25 that's -- that's noted in here.